

SANDRA D. O'NEAL,  
Plaintiff,  
  
v.  
  
CAROLYN W. COLVIN,  
Acting Commissioner of Social Security,  
Defendant.

)  
) Case No. 2:16-cv-00318-GMN-NJK  
)  
) **UNOPPOSED MOTION FOR EXTENSION OF**  
) **TIME (FIRST REQUEST)**  
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Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (“Defendant”) respectfully requests that the Court extend the time for Defendant to respond to Plaintiff’s Motion for Reversal and/or Remand from June 30, 2016 to July 29, 2016. All other dates in the Court’s Scheduling Order shall be extended accordingly.

This is Defendant's first request for an extension of time. Defendant respectfully submits that the requested extension is needed to evaluate and respond to the issues raised in Plaintiff's Motion, to allow reassignment of the case to a new attorney, who will need to review the case file, and to

1 accommodate Defendant's counsel's workload and pre-planned leave. This request is made in good  
2 faith with no intention to unduly delay the proceedings.

3 On June 21, 2016, counsel for Defendant conferred with Plaintiff's counsel, who does not  
4 oppose this motion.

5 Respectfully submitted,

6 Dated: June 21, 2016

7 DANIEL G. BOGDEN  
United States Attorney

8 By: /s/ Sundeep Patel  
9 SUNDEEP PATEL  
Special Assistant United States Attorney  
10 Attorneys for Defendant

11  
12 OF COUNSEL TO DEFENDANT:

13 DEBORAH LEE STACHEL  
Acting Regional Chief Counsel, Region IX

14 MARGARET BRANICK-ABILLA  
15 Assistant Regional Counsel

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18 IT IS SO ORDERED:

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21 HON. NANCY J. KOPPE  
22 UNITED STATES MAGISTRATE JUDGE

23 DATED: June 22, 2016  
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